

THE HONORABLE BARBARA J. ROTHSTEIN

IN THE UNITED STATE DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JENNIFER MILLER, CHRISTOPHER CAIN,  
JOSE GRINAN, KIMBERLY HALO, KELLY  
KIMMEY, JUMA LAWSON, SHARON  
PASCHAL, and PHILIP SULLIVAN, on behalf  
of themselves and all others similarly situated,

Plaintiff,

v.

AMAZON.COM, INC., and AMAZON  
LOGISTICS, INC.,

Defendants,

Case No. 2:21-cv-00204-BJR

**SECOND STIPULATED MOTION TO  
EXTEND DEFENDANTS' DEADLINE  
TO RESPOND TO THE PENDING  
MOTION TO SEAL**

Plaintiffs and Defendants, Amazon.com, Inc., and Amazon Logistics, Inc., (together the "Parties"), stipulate and hereby jointly request that the Court enter a second order extending Defendants' deadline to respond to Plaintiffs' Motion to Seal Confidential Documents in Support of Their Motion for Class Certification (Dkt. No. 108) (the "Motion to Seal") by a further two-weeks, from the current deadline of February 25, 2025 to March 11, 2025.

1. On January 21, 2025, Plaintiffs filed the Motion to Seal regarding documents Plaintiffs have provisionally lodged under seal in support of their pending Motion to Certify a

1 Class (Dkt. No. 110). The documents filed provisionally under seal are all documents which  
2 Defendants have designated confidential pursuant to the Protective Order in this case. *See* Dkt.  
3 No. 95. While Defendants had previously agreed to de-designate certain documents as confidential  
4 in a meet and confer with Plaintiffs, the document subject to the Motion to Seal are documents  
5 Defendants believe warrant protection from public filing.

6       2. Pursuant to Local Civil Rule 5(g)(3)(B), Amazon intends to file a “specific  
7 statement of the applicable legal standard and the reasons for keeping [the Confidential Exhibits]  
8 under seal,” including the specific explanations, in its responsive brief to the Motion to Seal.

9       3. The Parties previously stipulated to extend Amazon’s deadline to respond to the  
10 Motion to Seal to February 25, 2025, which this Court approved. *See* Dkt. Nos. 113 & 114.  
11 However, Amazon requires additional time to gather the declarations and material to support its  
12 forthcoming request to retain the exhibits (Dkt. No. 109) under seal, and accordingly has  
13 requested—and Plaintiffs have agreed—to extend the deadline for Amazon to file its responding  
14 brief by two additional weeks, to March 11, 2025.

15       4. An additional two-week extension for Amazon to file its response will not delay  
16 any deadlines in this case. Defendants’ response to Plaintiffs’ Motion to Certify a Class is not due  
17 until April 14, 2025, and that motion will not be fully briefed until April 28, 2025 (Dkt. No. 86).  
18 Accordingly, a brief additional two-week extension to file a response in support of the Motion to  
19 Seal will not delay adjudication of the underlying motion, affect future briefing on class  
20 certification, or otherwise delay litigation of this case.

1           THEREFORE, the Parties respectfully request that the Court enter an order extending  
2 Defendants' deadline to file a response in support of the pending Motion to Seal to **March 11,**  
3 **2025.**

4           IT IS SO STIPULATED.

5           DATED this 21<sup>st</sup> day of February, 2025.

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Amazon Logistics, Inc.*

**[PROPOSED] ORDER**

The foregoing Stipulated Motion is GRANTED. Defendants shall respond to the Unopposed Motion to Seal Confidential Documents in Support of Their Motion for Class Certification (Dkt. No. 108) on or before March 11, 2025.

IT IS SO ORDERED.

DATED this \_\_\_\_ day of \_\_\_\_\_, 2025.

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THE HONORABLE BARBARA J. ROTHSTEIN  
UNITED STATES DISTRICT JUDGE

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23 SECOND STIPULATED MOTION TO EXTEND  
24 DEFENDANTS' DEADLINE TO RESPOND TO THE  
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